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EXHIBIT D

Attorney for Defendant
Suibin Zhang

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

United States of America,)	No: CR-05-812-RMW (PSG)
)	
Plaintiff,)	STIPULATION TO PERMIT
)	SUIBIN ZHANG TO TRAVEL TO
vs.)	CHINA AND FOR ORDER
)	RELEASING HIS PASSPORT;
)	[] ORDER
SUIBIN ZHANG,)	
Defendants.)	

STIPULATION

Defendant and the government, through their respective counsel and subject to the Court's approval, hereby stipulate that the Order Setting the Conditions of Release issued by the Court on December 22, 2005, be modified, permitting Mr. Suibin Zhang to travel to and through China, leaving on May 9, 2015 and returning on

STIPULATION TO PERMIT SUIBIN ZHANG TO TRAVEL TO CHINA AND FOR ORDER
RELEASING HIS PASSPORT; ORDER

1 May 12, 2015. The parties also agree that the Court
2 issue an Order directing the Clerk for the Northern
3 District of California to forthwith release Mr. Zhang's
4 passport to him for the purpose of his travel to China.
5 It is further stipulated and agreed that Mr. Zhang is to
6 surrender his passport to the District Court Clerk
7 within 48-hours of his May 12, 2015, return to the
8 United States.
9

10 Further, it is ordered that Mr. Zhang provide
11 Pretrial Services a detailed itinerary setting forth
12 his airline flight numbers, his place of lodging, and
13 other contact information, including a telephone number
14 where he may be reached.
15

16 Defense counsel has previously conferred with
17 Pretrial Services Officer, Carol Mendoza, and she has
18 no objections to the request. She asked only that Mr.
19 Zhang provide her with a detailed itinerary setting
20 forth his flight numbers, his place of lodging, and
21 other contact information, including a telephone
22 number where he can be reached.
23

24 Dated:

25
26 May 4, 2015. S/ Manuel Araujo

27
28 May 4, 2105. S/ David Callaway

ORDER

THE PARTIES HAVING AGREED, AND GOOD CAUSE APPEARING, it is hereby ordered as follows:

(1) The Order Setting the Conditions of Release issued by the Court on December 22, 2005, is hereby modified to permit Suibin Zhang to travel to China, leaving on May 9, 2015, and returning to the United States on May 12, 2015.

(2) The Court's Clerk shall forthwith release to Mr. Zhang his passport. It is further Ordered that within forty-eight hours of Mr. Zhang's return on May 12, 2015, to the United States from China he is to surrender the passport to the Court's Clerks Office; And,

(3) All other conditions of release ordered on December 22, 2005, remain in full force and effect.

Dated: May 1, 2015

Ronald M. Whyte

United States District Judge

STIPULATION TO PERMIT SUIBIN ZHANG TO TRAVEL TO CHINA AND FOR ORDER
RELEASING HIS PASSPORT; ORDER